

**R. Hance Haney**  
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700  
Washington, DC 20036

202 429 3125  
202 293 0561 fax  
Email [hhaney@qwest.com](mailto:hhaney@qwest.com)



November 22, 2002

***Ex Parte***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-B204  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest  
Communications International Inc. for  
Authorization to Provide In-Region InterLATA  
Service in the States of Colorado, Idaho, Iowa,  
Montana, Nebraska, North Dakota, Utah,  
Washington and Wyoming**

**Subject: Qwest's Stand-Alone Test Environment  
(SATE)**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in the referenced proceeding in response to the following question from the Commission staff regarding Qwest's Stand Alone Test Environment (SATE).

**Question:** The staff asked Qwest to respond to WorldCom's *ex parte* letter dated November 6, 2002, at 12. There, WorldCom alleges that the process for adding test scenarios to SATE causes problems for competitive LECs because CLECs may be unaware that such test scenarios exist and may bear the consequences in production. The staff also asked whether there is any way for CLECs to learn of test scenarios requested by other CLECs.

**Response:** To accommodate the needs of all CLECs, the process for adding SATE data was established with the CLECs and provides a common set of scenarios in the SATE data document, with CLECs having the ability to request additional data as required to meet their specific testing needs. Specific data may be requested to accommodate individual CLEC operational processes, CLEC systems, and CLEC business plans, and these requests are responded to expeditiously. Qwest and the CLECs understood that as SATE

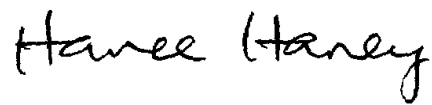
evolved, additional scenarios might be identified that the collective group of CLECs would find beneficial to be commonly available in the data document for testing. However, to avoid overload of the data document with scenarios only of interest to an individual CLEC, while simultaneously retaining the confidentiality of the specific CLEC request, a litmus test was developed. With the agreement of the CLECs, the litmus test for additional inclusion in the data document was determined to be when more than one CLEC requests similar data. See Qwest III Reply Declaration of Lynn M V Notarianni and Christie L. Doherty on Operations Support Systems ("Qwest III OSS Reply Declaration"), ¶ 172 and n.268. Qwest does not publish a list of the additional SATE test scenarios that have been requested by an individual CLEC. To date, no CLEC has requested that the process for adding scenarios to the data document be changed, either through recommendation at the SATE User's Group or through the Change Management Process.

WorldCom acknowledges the CLECs' agreement to the current process in its November 6 *ex parte* letter, but nevertheless moves on to assert that Qwest has refused to include "very common scenarios" in SATE. However, WorldCom does not identify any such scenarios that are not already in the SATE data document. Also, if a scenario were "very common" but the data is not already included in SATE, presumably it would be requested as an addition to SATE by more than one CLEC and therefore be included in the data document. WorldCom's assertion in the November 6 letter that Qwest does not include individually requested ("common") scenarios in its internal testing is also incorrect. As stated in the Qwest III OSS Reply Declaration at ¶172, Qwest does include in its internal testing each of the individually requested SATE test scenarios.

There is no evidence that the current process causes any problems for CLECs. The most common scenarios are available in production and a CLEC can request any additional scenarios the CLEC requires. Qwest knows of no cases where a CLEC could have avoided a problem in production by testing a SATE scenario requested by another CLEC.

The 20-page limit does not apply to this filing.

Sincerely,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, slightly slanted style.

cc: E. Yockus

M. Carowitz  
G. Remondino  
J. Myles  
R. Harsch  
J. Jewel  
P. Baker  
C. Post  
P. Fahn  
B. Smith  
J. Stanley  
C. Washburn  
S. Vick  
S. Oxley  
J. Orchard